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15	Counsel for Defendant Google LLC	
16 17	UNITED STATES	DISTRICT COURT
18	NORTHERN DISTRICT OF CAL	IFORNIA, OAKLAND DIVISION
19	CHASOM BROWN, WILLIAM BYATT,	Case No. 4:20-cv-03664-YGR-SVK
20	JEREMY DAVIS, CHRISTOPHER CASTILLO, and MONIQUE TRUJILLO,	DECLARATION OF JONATHAN TSE IN
21	individually and on behalf of all similarly situated,	SUPPORT OF PLAINTIFFS' ADMINISTRATIVE MOTION TO SEAL
22	,	DOCUMENTS (DKT. 394)
23	Plaintiffs,	
24	V.	Judge: Hon. Yvonne Gonzalez Rogers
25	GOOGLE LLC,	
26	Defendant.	
27		
28		

Case No. 4:20-cv-03664-YGR-SVK

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I, Jonathan Tse, declare as follows:

- I am a member of the bar of the State of California and an attorney at Quinn Emanuel Urquhart & Sullivan, LLP, attorneys for Defendant Google LLC ("Google") in this action. I make this declaration of my own personal, firsthand knowledge, and if called and sworn as a witness, I could and would testify competently thereto.
- 2. I am making this declaration pursuant to Civil Local Rule 79-5(e)-(f) as an attorney for Google as the Designating Party, pursuant to Civil Local Rule 79-5(f)(3) in response to Dkt. 394.
- 3. On February 3, 2022, Plaintiffs filed an administrative motion to file under seal portions of the Joint Case Management Statement (Dkt. 394). On February 3, 2022, I received an unredacted service copy of these documents. On February 17, 2022, the Court granted the Parties' Joint Stipulation and Proposed Order extending time for Google to submit its declaration in support of Plaintiffs' Motion to Seal (Dkt. 394) to February 17, 2022. (Dkt. 408).
- 4. I have reviewed the documents that Plaintiffs seek to file under seal pursuant to Civil Local Rule 79-5, unreducted versions of which have been filed at Docket Entry 394. Based on my review, Google has both good cause and compelling reasons to seal the following confidential information:

Document
Plaintiffs' Rule 15(a) Motion for
Leave to File their Third
Amended Complaint (Dkt. 394-
1)

Pages 5:20, 5:22-23 6:1-2, 8:12, 11:15-16, 12:2, 12:20-27, 13:1-2, 13:4, 13:6-12, 13:14, 14:7-12, 14:17-19, 16:6, 16:18, 17:1-13, 18:3-4, 18:8-16, 19:3-8, 20:21, 22:2

Google joins Plaintiffs' motion to seal in part with respect to this document.

Basis for Sealing

The information requested to be sealed contains Google's highly confidential and proprietary information, including details related to project names, cookies, internal identifiers, Google's internal communications and practices with regard to Incognito and its proprietary functions, as well as internal metrics and investigation into financial impact of certain features, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of

1		cyber security threats, as third parties may seek to use the
2		information to compromise Google's internal practices relating to competing products.
3	Declaration of Mark C. Mao in Support of Plaintiffs' Motion for	The information requested to be sealed contains Google's highly confidential and proprietary information, including
4	Leave to File their Third	details related to project names, internal identifiers, as well as
5	Amended Complaint	practices with regard to Incognito and its proprietary functions, that Google maintains as confidential in the
6	Pages 3:9. 3:18, 3:22	ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and
7	Google joins Plaintiffs' motion to seal in part with respect to this	proprietary information reveals Google's internal strategies, and business practices for operating and maintaining many of
8	document.	its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3.
9		Public disclosure of such confidential and proprietary
10		information could affect Google's competitive standing as competitors may alter their systems and practices relating to
11		competing products. It may also place Google at an increased risk of cyber security threats, as third parties may seek to use
12		the information to compromise Google's internal practices relating to competing products.
13	Exhibit 1 to Mao Decl. (GOOG-	The information requested to be sealed contains Google's
14	BRWN-00630517)	highly confidential and proprietary information, including details related to potential implementation considered by
15	Page 1	Google with regard to Incognito and its proprietary functions, that Google maintains as confidential in the ordinary course
16	Google joins Plaintiffs' motion to seal in part with respect to this	of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary
17	document.	information reveals Google's internal strategies, and business
18		practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective
19		Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information
20		could affect Google's competitive standing as competitors may alter their systems and practices relating to competing
21		products. It may also place Google at an increased risk of
22		cyber security threats, as third parties may seek to use the information to compromise Google's internal practices
23	Exhibit 3 to Mao Decl. (GOOG	relating to competing products. The information requested to be sealed contains Google's
24	BRWN-00475063)	highly confidential and proprietary information, including
25	Pages 1, 2, 4	details related to project names, cookies, internal identifiers, as well as Google's internal communications and practices
26	Google joins Plaintiffs' motion to	with regard to Incognito and its proprietary functions, that Google maintains as confidential in the ordinary course of its
27	seal in part with respect to this	business and is not generally known to the public or Google's
28	document.	competitors. Such confidential and proprietary information reveals Google's internal strategies, and business practices

1		for operating and maintaining many of its important services,
2		and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of
3		such confidential and proprietary information could affect
4		Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may
5		also place Google at an increased risk of cyber security threats, as third parties may seek to use the information to
6		compromise Google's internal practices relating to competing products.
7	Exhibit 4 to Mao Decl. (GOOG-CABR-03827263)	The information requested to be sealed contains Google's highly confidential and proprietary information, including
8	ŕ	details related to project names and internal identifiers, that
9	Page 1	Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's
10	Google joins Plaintiffs' motion to seal in part with respect to this	competitors. Such confidential and proprietary information reveals Google's internal strategies, and business practices
11	document.	for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order
12		entered in this action. See Dkt. 81 at 2-3. Public disclosure of
13		such confidential and proprietary information could affect Google's competitive standing as competitors may alter their
14		systems and practices relating to competing products. It may also place Google at an increased risk of cyber security
15		threats, as third parties may seek to use the information to
16		compromise Google's internal practices relating to competing products.
17	Exhibit 5 to Mao Decl. (GOOG-BRWN-00406065)	The information requested to be sealed contains Google's highly confidential and proprietary information, including
18	Pages 1-6	details related to project names, cookies, internal identifiers, Google's internal communications and practices with regard
19	Google joins Plaintiffs' motion to	to Incognito and its proprietary functions, as well as internal metrics, that Google maintains as confidential in the ordinary
20	seal in part with respect to this	course of its business and is not generally known to the public
21	document.	or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, and business
22		practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective
23		Order entered in this action. See Dkt. 81 at 2-3. Public
24		disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors
25		may alter their systems and practices relating to competing products. It may also place Google at an increased risk of
26		cyber security threats, as third parties may seek to use the information to compromise Google's internal practices
27		relating to competing products.
28	Exhibit 6 to Mao Decl. (GOOG-BRWN-00686207)	The information requested to be sealed contains Google's highly confidential and proprietary information, including
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1		details related to project names, internal identifiers, Google's
2	Pages 3-7	internal communications and practices with regard to
	Google joins Plaintiffs' motion to	Incognito and its proprietary functions, as well as internal metrics, that Google maintains as confidential in the ordinary
3	seal in part with respect to this	course of its business and is not generally known to the public
4	document.	or Google's competitors. Such confidential and proprietary
_		information reveals Google's internal strategies, and business
5		practices for operating and maintaining many of its important
6		services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public
٦		disclosure of such confidential and proprietary information
7		could affect Google's competitive standing as competitors
8		may alter their systems and practices relating to competing
9		products. It may also place Google at an increased risk of
٦		cyber security threats, as third parties may seek to use the information to compromise Google's internal practices
10		relating to competing products.
11	Exhibit 8 to Mao Decl. (GOOG-	The information requested to be sealed contains Google's
	BRWN-00042388)	highly confidential and proprietary information, including
12	Pages 4-5, 7-10, 12, 14, 17, 21,	details related to project names, cookies, internal identifiers, Google's internal communications and practices with regard
13	23, 26, 28, 31	to Incognito and its proprietary functions, as well as internal
14		metrics, that Google maintains as confidential in the ordinary
14	Google joins Plaintiffs' motion to	course of its business and is not generally known to the public
15	seal in part with respect to this	or Google's competitors. Such confidential and proprietary
16	document.	information reveals Google's internal strategies, and business practices for operating and maintaining many of its important
		services, and falls within the protected scope of the Protective
17		Order entered in this action. See Dkt. 81 at 2-3. Public
18		disclosure of such confidential and proprietary information
10		could affect Google's competitive standing as competitors may alter their systems and practices relating to competing
19		products. It may also place Google at an increased risk of
20		cyber security threats, as third parties may seek to use the
21		information to compromise Google's internal practices
	Exhibit 9 to Mao Decl. (GOOG-	relating to competing products. The information requested to be sealed contains Google's
22	BRWN-00140297)	highly confidential and proprietary information, including
23		details related to project names, cookies, internal identifiers,
24	Pages 15-17, 19-23, 27, 29, 31-33	Google's internal communications and practices with regard
24	Google joins Plaintiffs' motion to	to Incognito and its proprietary functions, as well as internal metrics, that Google maintains as confidential in the ordinary
25	seal in part with respect to this	course of its business and is not generally known to the public
26	document.	or Google's competitors. Such confidential and proprietary
		information reveals Google's internal strategies, and business
27		practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective
28		Order entered in this action. See Dkt. 81 at 2-3. Public

1		disclosure of such confidential and proprietary information
2		could affect Google's competitive standing as competitors
2		may alter their systems and practices relating to competing
3		products. It may also place Google at an increased risk of
4		cyber security threats, as third parties may seek to use the information to compromise Google's internal practices
4		relating to competing products.
5	Exhibit 10 to Mao Decl. (GOOG-	The information requested to be sealed contains Google's
	CABR-04324934)	highly confidential and proprietary information, including
6		details related to project names, cookies, internal identifiers,
7	Entirety	Google's internal communications and practices with regard
8	Google joins Plaintiffs' motion to	to Incognito and its proprietary functions, as well as internal metrics and investigation into financial impact of certain
0	seal in whole with respect to this	features, that Google maintains as confidential in the ordinary
9	document.	course of its business and is not generally known to the public
10		or Google's competitors. Such confidential and proprietary
10		information reveals Google's internal strategies, and business
11		practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective
12		Order entered in this action. See Dkt. 81 at 2-3. Public
12		disclosure of such confidential and proprietary information
13		could affect Google's competitive standing as competitors
14		may alter their systems and practices relating to competing
		products. It may also place Google at an increased risk of cyber security threats, as third parties may seek to use the
15		information to compromise Google's internal practices
16		relating to competing products.
17	Exhibit 12 to Mao Decl. (GOOG-	The information requested to be sealed contains Google's
17	CABR-03750737)	highly confidential and proprietary information, including
18	Pages 8-10, 16-18, 21	details related to project names, cookies, internal identifiers, as well as Google's internal communications and practices
19	rages 8-10, 10-18, 21	with regard to Incognito and its proprietary functions, that
17	Google joins Plaintiffs' motion to	Google maintains as confidential in the ordinary course of its
20	seal in part with respect to this	business and is not generally known to the public or Google's
21	document.	competitors. Such confidential and proprietary information
		reveals Google's internal strategies, and business practices for operating and maintaining many of its important services,
22		and falls within the protected scope of the Protective Order
23		entered in this action. See Dkt. 81 at 2-3. Public disclosure of
		such confidential and proprietary information could affect
24		Google's competitive standing as competitors may alter their
25		systems and practices relating to competing products. It may also place Google at an increased risk of cyber security
26		threats, as third parties may seek to use the information to
۷۵		compromise Google's internal practices relating to competing
27	Edition No. 2016	products.
28	Exhibit 13 to Mao Decl. (GOOG-CABR-04981563)	The information requested to be sealed contains Google's highly confidential and proprietary information, including
	CADIC-0-701303)	mgmy communical and proprietary information, including

details related to internal metrics and features related to 1 Page 4 Incognito and its proprietary functions, that Google maintains 2 as confidential in the ordinary course of its business and is not Google joins Plaintiffs' motion to generally known to the public or Google's competitors. Such 3 seal in part with respect to this confidential and proprietary information reveals Google's internal strategies, and business practices for operating and document. 4 maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this 5 action. See Dkt. 81 at 2-3. Public disclosure of such 6 confidential and proprietary information could affect Google's competitive standing as competitors may alter their 7 systems and practices relating to competing products. It may also place Google at an increased risk of cyber security 8 threats, as third parties may seek to use the information to 9 compromise Google's internal practices relating to competing products. 10 Exhibit 14 to Mao Decl. (GOOG-The information requested to be sealed contains Google's BRWN-00806426) highly confidential and proprietary information, including 11 details related to potential implementation considered by Google with regard to Incognito and its proprietary functions, Page 1 12 that Google maintains as confidential in the ordinary course 13 of its business and is not generally known to the public or Google joins Plaintiffs' motion to Google's competitors. Such confidential and proprietary seal in part with respect to this 14 information reveals Google's internal strategies, and business document. practices for operating and maintaining many of its important 15 services, and falls within the protected scope of the Protective 16 Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information 17 could affect Google's competitive standing as competitors may alter their systems and practices relating to competing 18 products. It may also place Google at an increased risk of cyber security threats, as third parties may seek to use the 19 information to compromise Google's internal practices relating to competing products. 20 The information requested to be sealed contains Google's Exhibit 16 to Mao Decl. (GOOG-21 highly confidential and proprietary information, including CABR-03923580) details related to project names, cookies, internal identifiers, 22 Google's internal communications and practices with regard Pages 1-2 to Incognito and its proprietary functions, as well as internal 23 metrics and investigation into financial impact of certain Google joins Plaintiffs' motion to 24 seal in part with respect to this features, that Google maintains as confidential in the ordinary document. course of its business and is not generally known to the public 25 or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, and business 26 practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective 27 Order entered in this action. See Dkt. 81 at 2-3. Public 28 disclosure of such confidential and proprietary information

1		could affect Google's competitive standing as competitors
2		may alter their systems and practices relating to competing
		products. It may also place Google at an increased risk of
3		cyber security threats, as third parties may seek to use the information to compromise Google's internal practices
4		relating to competing products.
4	Exhibit 20 to Mao Decl. (GOOG-	The information requested to be sealed contains Google's
5	CABR-04739841)	highly confidential and proprietary information, including
	,	details related to project names, cookies, internal identifiers,
6	Entirety	Google's internal communications and practices with regard
7	Constant Plaintiff, and	to Incognito and its proprietary functions, as well as internal
8	Google joins Plaintiffs' motion to seal in whole with respect to this	metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public
0	document.	or Google's competitors. Such confidential and proprietary
9		information reveals Google's internal strategies, and business
10		practices for operating and maintaining many of its important
		services, and falls within the protected scope of the Protective
11		Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information
12		could affect Google's competitive standing as competitors
		may alter their systems and practices relating to competing
13		products. It may also place Google at an increased risk of
14		cyber security threats, as third parties may seek to use the
1.5		information to compromise Google's internal practices relating to competing products.
15	Exhibit 22 to Mao Decl. (GOOG-	The information requested to be sealed contains Google's
16	BRWN-00477510)	highly confidential and proprietary information, including
17		details related to project names, cookies, internal identifiers,
1 /	Entirety	Google's internal communications and practices with regard
18	Google joins Plaintiffs' motion to	to Incognito and its proprietary functions, as well as internal metrics, that Google maintains as confidential in the ordinary
19	seal in whole with respect to this	course of its business and is not generally known to the public
	document.	or Google's competitors. Such confidential and proprietary
20		information reveals Google's internal strategies, and business
21		practices for operating and maintaining many of its important
		services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public
22		disclosure of such confidential and proprietary information
23		could affect Google's competitive standing as competitors
_		may alter their systems and practices relating to competing
24		products. It may also place Google at an increased risk of
25		cyber security threats, as third parties may seek to use the information to compromise Google's internal practices
26		relating to competing products.
20	Exhibit 23 to Mao Decl. (GOOG-	The information requested to be sealed contains Google's
27	BRWN-00388293)	highly confidential and proprietary information, including
28	Page 3	details related to internal dial-in or meeting information, that
-	Page 3	Google maintains as confidential in the ordinary course of its

Boogle joins Plaintiffs' motion to seal in part with respect to this document.			
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1		compromise Google's internal practices relating to competing products.
2	Exhibit 26 to Mao Decl. (GOOG-	The information requested to be sealed contains Google's
3	CABR-05756666)	highly confidential and proprietary information, including internal metrics related to Incognito, that Google maintains as
4	Page 18	confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such
5	Google joins Plaintiffs' motion to seal in part with respect to this	confidential and proprietary information reveals Google's internal strategies, and business practices for operating and
6	document.	maintaining many of its important services, and falls within
7		the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such
8		confidential and proprietary information could affect Google's competitive standing as competitors may alter their
9		systems and practices relating to competing products. It may also place Google at an increased risk of cyber security
10		threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing
11		products.
12	Exhibit 28 to Mao Decl. (GOOG-	The information requested to be sealed contains Google's
13	CABR-04967959)	highly confidential and proprietary information, including details related to project names, cookies, internal identifiers,
14	Entirety	Google's internal communications and practices with regard to Incognito and its proprietary functions, as well as internal
15	Google joins Plaintiffs' motion to seal in whole with respect to this	metrics and investigation into financial impact of certain features, that Google maintains as confidential in the ordinary
16	document.	course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary
17		information reveals Google's internal strategies, and business
18		practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective
19		Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information
20		could affect Google's competitive standing as competitors may alter their systems and practices relating to competing
21		products. It may also place Google at an increased risk of cyber security threats, as third parties may seek to use the
22		information to compromise Google's internal practices
23	Exhibit 29 to Mao Decl. (GOOG-	relating to competing products. The information requested to be sealed contains Google's
24	BRWN-00750077)	highly confidential and proprietary information, including details related to project names, internal identifiers, Google's
25	Entirety	internal communications and practices with regard to
26	Google joins Plaintiffs' motion to	Incognito and its proprietary functions, as well as internal metrics, that Google maintains as confidential in the ordinary
27	seal in whole with respect to this	course of its business and is not generally known to the public
28	document.	or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, and business

1		practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective
2		Order entered in this action. See Dkt. 81 at 2-3. Public
3		disclosure of such confidential and proprietary information
4		could affect Google's competitive standing as competitors may alter their systems and practices relating to competing
		products. It may also place Google at an increased risk of
5		cyber security threats, as third parties may seek to use the
6		information to compromise Google's internal practices relating to competing products.
7	Exhibit 30 to Mao Decl. (GOOG-	The information requested to be sealed contains Google's
0	BRWN-00601022)	highly confidential and proprietary information, including details related to project names, cookies, internal identifiers,
8	Page 1	Google's internal communications and practices with regard
9		to Incognito and its proprietary functions, as well as internal
10	Google joins Plaintiffs' motion to seal in part with respect to this	metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public
11	document.	or Google's competitors. Such confidential and proprietary
		information reveals Google's internal strategies, and business
12		practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective
13		Order entered in this action. See Dkt. 81 at 2-3. Public
14		disclosure of such confidential and proprietary information
		could affect Google's competitive standing as competitors may alter their systems and practices relating to competing
15		products. It may also place Google at an increased risk of
16		cyber security threats, as third parties may seek to use the
17		information to compromise Google's internal practices relating to competing products.
18	Exhibit 31 to Mao Decl. (GOOG-	The information requested to be sealed contains Google's
	BRWN-00529122)	highly confidential and proprietary information, including
19	Pages 1-3	details related to cookies, internal identifiers, Google's internal communications and practices with regard to
20	Tuges 1 3	Incognito and its proprietary functions, as well as internal
21	Google joins Plaintiffs' motion to	metrics, that Google maintains as confidential in the ordinary
	seal in part with respect to this document.	course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary
22		information reveals Google's internal strategies, and business
23		practices for operating and maintaining many of its important
24		services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public
25		disclosure of such confidential and proprietary information
		could affect Google's competitive standing as competitors may alter their systems and practices relating to competing
26		products. It may also place Google at an increased risk of
27		cyber security threats, as third parties may seek to use the
28		information to compromise Google's internal practices relating to competing products.
		relating to competing products.

1	Exhibit 32 to Mao Decl. (Kleber	The information requested to be sealed contains Google's
2	Tr.)	highly confidential and proprietary information, including
2	B 4 14 172 10	details related to project names, internal identifiers, as well as
3	Pages 4:14, 172:10	internal metrics that Google maintains as confidential in the
	Google joins Plaintiffs' motion to	ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and
4	seal in part with respect to this	proprietary information reveals Google's internal strategies,
5	document.	and business practices for operating and maintaining many of
		its important services, and falls within the protected scope of
6		the Protective Order entered in this action. See Dkt. 81 at 2-3.
7		Public disclosure of such confidential and proprietary
		information could affect Google's competitive standing as
8		competitors may alter their systems and practices relating to
9		competing products. It may also place Google at an increased risk of cyber security threats, as third parties may seek to use
		the information to compromise Google's internal practices
10		relating to competing products.
11	Exhibit 34 to Mao Decl. (GOOG-	The information requested to be sealed contains Google's
11	BRWN-00397243)	highly confidential and proprietary information, including
12		details related to cookies and internal discussions for potential
13	Pages 2	features to be implemented related to Incognito and its
13	Casala ising Plaintiffs' mation to	proprietary functions, that Google maintains as confidential
14	Google joins Plaintiffs' motion to seal in part with respect to this	in the ordinary course of its business and is not generally known to the public or Google's competitors. Such
1.5	document.	confidential and proprietary information reveals Google's
15		internal strategies, and business practices for operating and
16		maintaining many of its important services, and falls within
17		the protected scope of the Protective Order entered in this
17		action. See Dkt. 81 at 2-3. Public disclosure of such
18		confidential and proprietary information could affect
10		Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may
19		also place Google at an increased risk of cyber security
20		threats, as third parties may seek to use the information to
		compromise Google's internal practices relating to competing
21		products.
22	Exhibit 36 to Mao Decl. (GOOG-	The information requested to be sealed contains Google's
	BRWN-00490767)	highly confidential and proprietary information, including
23	Pages 6-7	details related to internal metrics and investigation into financial impact of certain features, that Google maintains as
24	1 ages 0-7	confidential in the ordinary course of its business and is not
	Google joins Plaintiffs' motion to	generally known to the public or Google's competitors. Such
25	seal in part with respect to this	confidential and proprietary information reveals Google's
26	document.	internal strategies, and business practices for operating and
		maintaining many of its important services, and falls within
27		the protected scope of the Protective Order entered in this
28		action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect
20		confidential and proprietary information could affect

1		Google's competitive standing as competitors may alter their
		systems and practices relating to competing products. It may
2		also place Google at an increased risk of cyber security
3		threats, as third parties may seek to use the information to
		compromise Google's internal practices relating to competing
4	Exhibit 37 to Mao Decl. (GOOG-	products. The information requested to be sealed contains Google's
5	CABR-04787255)	highly confidential and proprietary information, including
		details related to project names, cookies, internal identifiers,
6	Entirety	Google's internal communications and practices with regard
7		to Incognito and its proprietary functions, as well as internal
	Google joins Plaintiffs' motion to	metrics and investigation into financial impact of certain
8	seal in whole with respect to this	features, that Google maintains as confidential in the ordinary
9	document.	course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary
		information reveals Google's internal strategies, and business
10		practices for operating and maintaining many of its important
11		services, and falls within the protected scope of the Protective
		Order entered in this action. See Dkt. 81 at 2-3. Public
12		disclosure of such confidential and proprietary information
13		could affect Google's competitive standing as competitors
		may alter their systems and practices relating to competing products. It may also place Google at an increased risk of
14		cyber security threats, as third parties may seek to use the
15		information to compromise Google's internal practices
		relating to competing products.
16	Exhibit 38 to Mao Decl. (GOOG-	The information requested to be sealed contains Google's
17	CABR-03738741)	highly confidential and proprietary information, including
	Entirety	details related to project names, cookies, internal identifiers, Google's internal communications and practices with regard
18	Entirety	to Incognito and its proprietary functions, as well as internal
19	Google joins Plaintiffs' motion to	metrics and investigation into financial impact of certain
	seal in whole with respect to this	features, that Google maintains as confidential in the ordinary
20	document.	course of its business and is not generally known to the public
21		or Google's competitors. Such confidential and proprietary
		information reveals Google's internal strategies, and business practices for operating and maintaining many of its important
22		services, and falls within the protected scope of the Protective
23		Order entered in this action. See Dkt. 81 at 2-3. Public
		disclosure of such confidential and proprietary information
24		could affect Google's competitive standing as competitors
25		may alter their systems and practices relating to competing
		products. It may also place Google at an increased risk of
26		cyber security threats, as third parties may seek to use the information to compromise Google's internal practices
27		relating to competing products.
	Exhibit 39 to Mao Decl. (GOOG-	The information requested to be sealed contains Google's
28	CABR-00903677)	highly confidential and proprietary information, including
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1		details related to internal analyses and metrics for certain
2	Entirety	Google products and their proprietary functions, that Google maintains as confidential in the ordinary course of its business
3	Google joins Plaintiffs' motion to seal in whole with respect to this	and is not generally known to the public or Google's competitors. Such confidential and proprietary information
4	document.	reveals Google's internal strategies, and business practices for operating and maintaining many of its important services,
5		and falls within the protected scope of the Protective Order
6		entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect
7		Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may
8		also place Google at an increased risk of cyber security threats, as third parties may seek to use the information to
9		compromise Google's internal practices relating to competing products.
10	Exhibit 40 to Mao Decl. (GOOG-	The information requested to be sealed contains Google's
11	CABR-00547295)	highly confidential and proprietary information, including details related to project names, cookies, internal identifiers,
12	Entirety	Google's internal communications and practices with regard
13	Google joins Plaintiffs' motion to	to Incognito and its proprietary functions, as well as internal metrics, that Google maintains as confidential in the ordinary
14	seal in whole with respect to this document.	course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary
15		information reveals Google's internal strategies, and business practices for operating and maintaining many of its important
16		services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public
17		disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors
18		may alter their systems and practices relating to competing
19		products. It may also place Google at an increased risk of cyber security threats, as third parties may seek to use the
20		information to compromise Google's internal practices relating to competing products.
21	Exhibit 41 to Mao Decl. (GOOG-	The information requested to be sealed contains Google's
22	CABR-04076770)	highly confidential and proprietary information, including details related to internal analyses and metrics for certain
23	Entirety	Google products and their proprietary functions, that Google maintains as confidential in the ordinary course of its business
24	Google joins Plaintiffs' motion to seal in whole with respect to this	and is not generally known to the public or Google's competitors. Such confidential and proprietary information
25	document.	reveals Google's internal strategies, and business practices
26		for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order
27		entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect
28		Google's competitive standing as competitors may alter their

1		systems and practices relating to competing products. It may
2		also place Google at an increased risk of cyber security threats, as third parties may seek to use the information to
3		compromise Google's internal practices relating to competing products.
4	Exhibit 42 to Mao Decl. (GOOG-	The information requested to be sealed contains Google's
5	CABR-00543864)	highly confidential and proprietary information, including details related to internal project names, cookies, internal
6	Entirety	identifiers, as well as internal metrics and investigation into financial impact of certain features, that Google maintains as
7	Google joins Plaintiffs' motion to seal in whole with respect to this	confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such
8	document.	confidential and proprietary information reveals Google's internal strategies, and business practices for operating and
9		maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this
10		action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect
11		Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may
12		also place Google at an increased risk of cyber security
14		threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing
	E 1717 42 4 M D 1	products.
15	Exhibit 43 to Mao Decl. (Google's Responses and	The information requested to be sealed contains Google's highly confidential and proprietary information, including
16	Objections to Plaintiffs' 8th Set ROGs [Nos. 30-33])	details related to internal analyses and metrics for certain Google products and their proprietary functions as well as
17	Pages 8	Google's internal practices with regard to Incognito and its proprietary functions, that Google maintains as confidential
18	Google joins Plaintiffs' motion to	in the ordinary course of its business and is not generally known to the public or Google's competitors. Such
19	seal in part with respect to this	confidential and proprietary information reveals Google's
20	document.	internal strategies, and business practices for operating and maintaining many of its important services, and falls within
21		the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such
22		confidential and proprietary information could affect Google's competitive standing as competitors may alter their
23		systems and practices relating to competing products. It may
24		also place Google at an increased risk of cyber security threats, as third parties may seek to use the information to
25		compromise Google's internal practices relating to competing products.
26		production.
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5. Google has significantly pared back Plaintiffs' proposed redactions to 22 of the documents and exhibits Plaintiffs' originally filed under seal. Furthermore, Google does not seek to

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redact or file under seal any of the remaining portions of Plaintiffs' Opposition not indicated in the table above. Specifically, Google is not seeking to seal 11 of the exhibits Plaintiffs' originally filed under seal (Exhibits 2, 7, 11, 15, 17, 18, 19, 21, 27, 33, 35).

- A party seeking to seal material must "establish[] that the document, or portions 6. thereof, are privileged, protectable as a trade secret or otherwise entitled to protection under the law" (i.e., is "sealable"). Civ. L.R. 79-5(b).
- 7. The sealing request must also "be narrowly tailored to seek sealing only of sealable material." Id. "The publication of materials that could result in infringement upon trade secrets has long been considered a factor that would overcome the strong presumption" in favor of public access. Apple Inc. v. Psystar Corp., 658 F.3d 1150, 1162 (9th Cir. 2011). The Ninth Circuit has confirmed that "ordinarily a party must show 'compelling reasons' to keep a court document under seal." Ctr. for Auto Safety v. Chrysler Grp., LLC, 809 F.3d 1092, 1095 (9th Cir. 2016). Quoting the Supreme Court's decision in Nixon v. Warner Communications, however, the Court has noted that examples of what might constitute a compelling reason include "sources of business information that might harm a litigant's competitive standing." Id. at 1097 (quoting 435 U.S. 589, 598-99 (1978)).
- 8. Courts have repeatedly found it appropriate to seal documents that contain "business information that might harm a litigant's competitive standing." Nixon v. Warner Commc'ns, Inc., 435 U.S. 589, 589-99 (1978). Materials that could harm a litigant's competitive standing may be sealed under the "compelling reasons" standard. See, e.g., Icon-IP Pty Ltd. v. Specialized Bicycle Components, Inc., 2015 WL 984121, at *2 (N.D. Cal. Mar. 4, 2015) (information "is appropriately sealable under the 'compelling reasons' standard where that information could be used to the company's competitive disadvantage") (citation omitted). Courts in this district have also determined that motions to seal may be granted as to potential trade secrets. See, e.g., United Tactical Sys., LLC v. Real Action Paintball, Inc., 2015 WL 295584, at *3 (N.D. Cal. Jan. 21, 2015) (rejecting argument against sealing "that [the party] ha[s] not shown that the substance of the information . . . amounts to a trade secret").

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9. Although the materials that Google seeks to seal here easily meet the higher "compelling reasons" standard, the Court need only consider whether these materials meet the lower "good cause" standard. Pursuant to Federal Rule of Civil Procedure 26(c), "[t]he court may, for good cause, issue an order...requiring that a trade secret or other confidential research, development, or commercial information not be revealed or be revealed only in a specified way." Fed. R. Civ. P. 26(c)(1)(G). A party seeking to seal information in a non-dispositive motion must show only "good cause." See Kamakana v. City & Cty. of Honolulu, 447 F.3d 1172, 1179-80 (9th Cir. 2006). "While recognizing that there is little clarity as to what, exactly, constitutes a 'dispositive' motion, and that our circuit has not articulated the difference between a dispositive and nondispositive motion the district court decided to read dispositive to mean that unless the motion could literally lead to the final determination on some issue, a party need show only good cause to keep attached documents under seal." Ctr. for Auto Safety v. Chrysler Grp., LLC, 809 F.3d 1092, 1095–96 (9th Cir. 2016) (internal quotation marks omitted). A "motion for leave to file a amend a complaint is generally considered a nondispositive matter." Au v. Funding Grp., Inc., No. CIV. 11-00541 SOM, 2012 WL 3686893, at *1 (D. Haw. Aug. 24, 2012), aff'd, 588 F. App'x 707 (9th Cir. 2014).

10. Under the "good cause" standard, courts will seal statements reporting on a company's users, sales, investments, or other information that is ordinarily kept secret for competitive purposes. *See Hanginout, Inc. v. Google, Inc.,* 2014 WL 1234499, at *1 (S.D. Cal. Mar. 24, 2014); *Nitride Semiconductors Co. v. RayVio Corp.*, 2018 WL 10701873, at *1 (N.D. Cal. Aug. 1, 2018) (granting motion to seal "[c]onfidential and proprietary information regarding [Defendant]'s products" under "good cause" standard) (Van Keulen, J.). The select information Google seeks to seal is the type that the Ninth Circuit has held to properly be kept under seal. *See Sun Microsystems Inc. v. Network Appliance*, No. C–08–01641–EDL, 2009 WL 5125817, at *9 (N.D. Cal Dec. 21, 2009) (sealing confidential business information, which if disclosed could cause harm to the parties). This information retains independent economic value from not being generally known to, and not being readily ascertainable through proper means to the general public. 18 U.S.C. § 1839(3)(B).

- 11. The information Google is seeking to seal all comprise confidential and proprietary information as the materials involve highly sensitive features of Google's internal systems and operations that Google does not share publicly. Specifically, this information provides details related to project names, cookies, internal identifiers, Google's internal communications and practices with regard to Incognito and its proprietary functions, as well as internal metrics and investigation into financial impact of certain features, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services while complying with legal and privacy obligations.
- 12. Public disclosure of the above-listed information would harm Google's competitive standing it has earned through years of innovation and careful deliberation, by revealing sensitive aspects of Google's proprietary systems, strategies, and designs to Google's competitors, allowing them to alter their own plans for product development and/or commercialization, time strategic litigation, focus their patent prosecution strategies, or otherwise unfairly compete with Google. That alone is a proper basis to seal such information. *See, e.g., Free Range Content, Inc. v. Google Inc.*, No. 14-cv-02329-BLF, Dkt. No. 192, at 3-9 (N.D. Cal. May 3, 2017) (granting Google's motion to seal certain sensitive business information related to Google's processes and policies to ensure the integrity and security of a different advertising system); *Huawei Techs., Co. v. Samsung Elecs. Co.*, No. 3:16-cv-02787-WHO, Dkt. No. 446, at 19 (N.D. Cal. Jan. 30, 2019) (sealing confidential sales data because "disclosure would harm their competitive standing by giving competitors insight they do not have"); *Delphix Corp. v. Actifio, Inc.*, No. 13-cv-04613-BLF, 2014 WL 4145520, at *2 (N.D. Cal. Aug. 20, 2014) (sealing "highly sensitive information regarding Delphix's product architecture and development").
- 13. Moreover, if publicly disclosed, malicious actors may use such information to seek to compromise Google's internal servers and components thereof. Google would be placed at an increased risk of cyber security threats. *See, e.g., In re Google Inc. Gmail Litig.*, 2013 WL 5366963, at *3 (N.D. Cal. Sept. 25, 2013) (sealing "material concern[ing] how users' interactions with the

1	Gmail system affects how messages are transmitted" because if made public, it "could lead to a
2	breach in the security of the Gmail system"). The security threat is an additional reason for this
3	Court to seal the identified information. Thus, the confidential information at issue satisfies both the
4	compelling reason and good cause standards.
5	14. Google's request is narrowly tailored in order to protect its confidential information.
6	These redactions are limited in scope and volume. Because the proposed redactions are narrowly
7	tailored and limited to portions containing Google's highly-confidential or confidential information,
8	Google requests that the portions of the aforementioned documents be redacted from any public
9	version of those documents.
10	I declare under penalty of perjury of the laws of the United States that the foregoing is true
11	and correct. Executed in San Francisco, California on February 17, 2022.
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13	DATED: February 17, 2022 QUINN EMANUEL URQUHART &
14	SULLIVAN, LLP
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16	By /s/ Jonathan Tse Jonathan Tse
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18	Attorney for Defendant
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